## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

C. PEPPER LOGISTICS, LLC, et al.,	)
Plaintiffs,	) ) Case No.: 4:20-cv-01444
v.	)
LANTER DELIVERY SYSTEMS, LLC, et al.,	) ) )
Defendants.	)

## DECLARATION OF RANDI WOOD PURSUANT TO 28 U.S.C. § 1746

- I, Randi Wood, declare as follows under 28 U.S.C § 1746:
  - 1. I am the age of majority, and I am competent to make this declaration.
  - 2. I make this declaration based on my personal knowledge and observations.
  - 3. I began working for Logistic Resources Solutions, Inc. ("LRS"), in or around October of 2017.
  - 4. I started my employment with LRS in Denver, Colorado. I was transferred to Olathe, Kansas in or around December 2018. I finished my employment with LRS in Olathe, Kansas as the Regional Transportation Manager for the Kansas Area.
  - 5. LRS was, and to my knowledge is, an Illinois corporation.
  - 6. I performed my day to day job responsibilities for LRS in Olathe, Kansas. Those consisted of, *inter alia*, hiring and firing supervisors, drivers, and maintenance personnel; payroll; coordinating and logging hours of service; and organizing and coordinating driver dispatch.
  - 7. The last date I performed services for LRS was August 21, 2020. This was also the date I was told that Lanter Delivery Systems, LLC would no longer be doing business with C. Pepper Logistics, LLC et al. as of August 22, 2020. This was told to me around 7 p.m. on August 21, 2020, in Olathe, Kansas. Prior to being informed of this, I knew nothing about the cessation of LRS's or any C. Pepper Logistics, LLC affiliate's business operations.

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- 8. Prior to the end of my employment with LRS, I never communicated with Lanter Delivery Systems, LLC, White Line Systems, LLC, or Darien Brokerage, LLC employees or representatives concerning any orchestration of activities that would lead to the cessation of LRS's or any C. Pepper Logistics, LLC affiliate's business operations.
- 9. I had no role in the alleged conspiracy or plot described in the Petition of the above-captioned case.
- 10. I did not take any confidential or proprietary information from LRS or its affiliates upon my termination of employment with LRS.
- 11. I did not provide any confidential or proprietary information of LRS or its affiliates to any other business.
- 12. I do not currently reside in Missouri and have never resided in Missouri.
- 13. I do not own, lease, or possess property real or personal that is located in Missouri.
- 14. I do not have a bank account in Missouri.
- 15. I have not availed myself to the state or Federal courts of Missouri.
- 16. I have never had any ownership interest in any business based in Missouri.
- 17. LRS failed to pay me wages for the work I performed during the week of August 17, 2010, through August 23, 2020.
- 18. On August 23, 2020, I no longer had access to LRS's email system because they shut it off. Thus, I was unable to send payroll to them without a valid email address, so I inquired and was told to turn in payroll to Mr. Bontemps. I did this solely to ensure payroll was completed. LRS payroll information was not confidential or proprietary. This information was routinely seen by Lanter Delivery Systems, LLC personnel.
- 19. Kevin Bontemps worked, and works, out of Lanter's Maddison, Illinois office.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

	12/22/2020	
Executed on _		DocuSigned by:
		Randi Wood
		6F4642B95F1247A
		Randi Wood